

AFFIDAVIT

Michael J. Carazza, Special Agent, Federal Bureau of Investigation, being
duly sworn, states:

I am a Special Agent of the Federal Bureau of Investigation (FBI) and have
been so employed for over twenty-one years. I am currently assigned to the Public
Corruption squad. I have been assigned to the Public Corruption squad full time for
approximately eight years, but have also worked and investigated public corruption matters
throughout my career. I have also investigated white collar crime, fugitive, and violent
crime matters. In my current assignment, I have been involved in the investigation of
public corruption and other offenses which are violations of federal statutes within the
jurisdiction of the FBI. I personally participated in the investigation of violations of federal
law by Todd RANDALL ("RANDALL") and others in the course of this investigation.

During my tenure with the FBI, I have been involved in dozens of
investigations. I have debriefed defendants, informants, and witnesses. I have conducted
surveillance, worked with confidential informants, and participated in investigations using
court-authorized interception of wire and electronic communications. During my law
enforcement career, I have also participated in the preparation and execution of numerous
arrest warrants and search warrants.

This affidavit is submitted in support of a criminal complaint charging RANDALL
with making false statements and representations when interviewed by the FBI regarding an
ongoing corruption investigation in violation of Title 18, United States Code, Section
1001(a).

This affidavit is being submitted for the limited purpose of establishing probable
cause to believe that RANDALL violated 18 U.S.C. § 1001(a). I have included only those
facts I believe to be necessary to make this showing. This affidavit does not include each
and every fact known to me concerning this investigation. The foregoing facts are based on
my personal participation in this investigation, including but not limited to, first-hand

1 observations of the defendant, as well as my conversations with and review of reports from
2 other federal law enforcement officers.

3 On January 22, 2010, RANDALL, a City of Revere Police Officer, met with an FBI
4 confidential informant ("CI") and accepted \$200 in exchange for RANDALL's assistance
5 with a criminal case pending in Chelsea District Court. At approximately 11:20 a.m. on
6 January 22, 2010, agents with the FBI observed RANDALL, who was on duty, in a police
7 uniform, and operating a marked Revere Police cruiser, as he traveled to the home of the CI
8 in Everett, Massachusetts. RANDALL was observed and photographed as he exited Revere
9 Police cruiser #103 and entered the home of the CI.

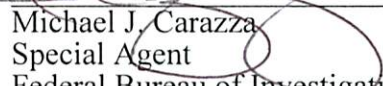
10 While inside the home of the CI, RANDALL accepted \$200 in FBI funds from the
11 CI and then explained the efforts he would make to compromise a pending criminal case in
12 Chelsea District Court for a friend of the CI. RANDALL also asked the CI if he/she had
13 access to any Percocet pills to which the CI replied that he/she did not. As RANDALL
14 departed the residence he explained to the CI that he had previously obtained Percocets by
15 the "wheelbarrow" and "500 at a time" but that they were now harder to obtain. The
16 interaction between the CI and RANDALL, including the exchange of \$200, was
17 memorialized on film through the use of a concealed audio and video recording device
18 previously installed by the FBI in the home of the CI.

19 On March 14, 2011, FBI Special Agents Kevin Constantine and this writer
20 traveled to the home of RANDALL and interviewed him. Agents explained to RANDALL
21 that the FBI was investigating information that RANDALL had assisted the CI's friend with
22 a court case. RANDALL denied knowing the CI or the CI's friend. Agents then explained to
23 RANDALL that the FBI had received information that RANDALL had been to the CI's
24 house located in Everett, Massachusetts, while operating a Revere Police Department
25 cruiser. RANDALL denied being present at the home of the CI. RANDALL was then asked
26 if he had ever accepted money for a court case from the CI on behalf of a third individual.
27 RANDALL denied accepting any money from the CI. Agents then explained to RANDALL
28 that withholding information or lying to the interviewing agents was a violation of federal

1 law and that he could be prosecuted. RANDALL once again denied ever being present at
 2 the CI's house. Agents then specifically asked RANDALL whether he accepted \$200 from
 3 the CI for his assistance with a court case. RANDALL again denied accepting money from
 4 the CI. Once again, agents explained to RANDALL that lying to the interviewing agents
 5 was a federal crime for which he could be prosecuted. RANDALL replied that he
 6 understood and stated, "I have no reason to lie to ya fellas." Agents again asked
 7 RANDALL if he had ever been present at the Everett home of the CI. RANDALL denied
 8 that he had been present at the home of the CI. Agents then asked RANDALL,
 9 hypothetically, if the FBI possessed a photo of a uniformed Revere Police officer at the
 10 Everett home of the CI, could RANDALL be the officer in the photo. RANDALL denied
 11 being at the home of the CI and then stated in disbelief that "if there is a photo of me I'd
 12 like to see it." ¹

13 CONCLUSION

14 Based on the information set forth above, I believe probable cause exists to conclude
 15 that on or about March 14, 2011, Todd RANDALL did knowingly and willfully make
 16 materially false statements and representations when interviewed by the FBI regarding an
 17 ongoing corruption investigation in violation of 18 U.S.C. § 1001(a).

18
 19 
 20 Michael J. Carazza
 21 Special Agent
 22 Federal Bureau of Investigation
 23 Boston, Massachusetts

24 Subscribed and sworn to before me this 8th day of April, 2011.



29 
 30 JENNIFER C. BOAL
 31 United States Magistrate Judge

Two photos taken of RANDALL while meeting with, and accepting payment from, the
 CI inside the CI's Everett home are attached hereto as Exhibit 1.